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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

APR 16 1999

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)	
)	
Request for Expeditious Review of the)	CC Docket No. 92-237
Transfer of the Lockheed Martin)	NSD File No. 98-151
Communications Industry Services)	
Business)	
)	
To: The Common Carrier Bureau)	

**COMMENTS
 OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) hereby submits its comments in the above-captioned proceeding regarding a request by Lockheed Martin IMS Corporation (Lockheed Martin) to transfer its Communications Industry Services (CIS) Business to Warburg Pincus & Co. (Warburg Pincus). The Common Carrier Bureau issued a Public Notice¹ seeking comments on the proposed transfer of Lockheed Martin's responsibilities as the North American Numbering Plan Administrator (NANPA).

USTA is the principal trade association of the local exchange carrier (LEC) industry. Its members provide over 95 percent of the exchange carrier-provided access lines in the United States and, as such, are primary users of numbering resources. USTA responded to

¹Public Notice, DA 99-347, released February 17, 1999. The date to file comments was extended by the Bureau in a Public Notice, DA 99-516, released March 15, 1999.

the Bureau's earlier request to provide input into questions that the Bureau would submit to Lockheed Martin on its petition.

These comments address Lockheed Martin's February 16, 1999 responses to questions of the Bureau and responses submitted by Mitretek Systems (Mitretek) on February 12, 1999. In addition, they take into account the response filed by the North American Numbering Council (NANC) on March 31, 1999 (NANC Response).² The NANC Response is a consensus of the NANC members that Warburg Pincus is capable of performing the required NANPA functions but that issues of neutrality are raised.

USTA participated in and endorses the consensus reflected in the NANC Response to the Commission. USTA does not object to acceptance of the modified proposal made by Lockheed Martin to transfer its CIS Business to Warburg Pincus. However, USTA believes that final Commission approval of the transfer should provide sufficient opportunity to resolve issues that remain outstanding with the Limited Liability Corporations (LLCs).

USTA also continues to be concerned about the long term implications raised by this situation, particularly the uninterrupted continuation of effective numbering administration.³ This anxiety has influenced USTA's position on the Lockheed Martin request. USTA believes that the industry should address the process and qualification

²Letter from Alan C. Hasselwander, Chairman, North American Numbering Council, to Lawrence E. Strickling, Chief, Common Carrier Bureau, dated March 31, 1999.

³See Questions of USTA in CC Docket No. 92-237 and NSD File No. 98-151, filed January 22, 1999.

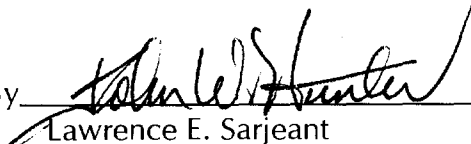
issues well before the expiration of the current contract for NANPA responsibilities so that any revisions to the process and qualification conditions are fully resolved before new applications are solicited. USTA urges that this critical issue should be undertaken by the NANC as a part of those ongoing activities.

USTA urges the Commission to consider these comments in determining whether to grant the request of Lockheed Martin to transfer its CIS Business to Warburg Pincus and in considering other related long-term issues related to number administration.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

Its Attorneys:

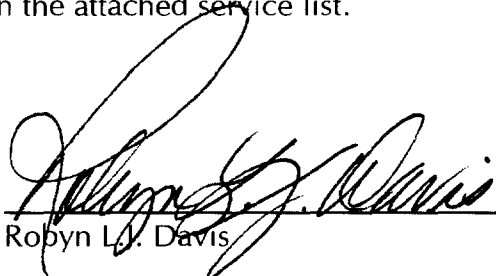
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April 16, 1999

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on April 16, 1999 copies of the Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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